



Shell Offshore Inc.
An affiliate of Shell Oil Company



12

Exploration and Production

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July 14, 1999

Department of the Interior
Minerals Management Service (MS 4024)
381 Elden Street
Herndon, Virginia 20170-4817
Attention: Rules Processing Team

Subject: COMMENTS REGARDING MMS PROPOSED RULE
SUBPART "O" TRAINING REQUIREMENTS FOR OCS OPERATIONS

Shell Offshore Inc. (SOI), appreciates the opportunity to submit comments on the Minerals Management Service (MMS) proposed rule on training of Lessee and Contractor Employees engaged in Oil and Gas and Sulphur Operations in the Outer Continental Shelf (OCS).

While SOI commends the MMS's stated objectives of developing a "performance-based training system" and providing "increased training flexibility", OCS Operators could be negatively impacted by a drastic increase in administrative burden and unnecessary duplication of efforts, which have been undertaken as a result of their individual Safety and Environmental Management Programs. Furthermore, while SOI maintains detailed training records on its employees and could likely handle the increased record keeping, this ruling could put undue hardship on Contractors, who's workforce by nature is more transient in make-up.

Finally, as an attachment to this letter, SOI has included more specific comments with regard to this rule-making, and if the MMS has further questions or concerns regarding this matter, please contact Mr. Mark Davis of my staff at (504) 728-0198.

Yours truly,

Phil B. Smith
Team Leader – Permits & Issues
Shell Offshore Inc.

PBS/mwd

Attachment

COMMENTS ON PROPOSED RULE – 30 CFR 250 FR 19318
July 14, 1999
SUBPART O TRAINING

250.1500 **Definitions**
(No Comment)

250.1501 **What is the goal of my training program?**
Delete the word "experienced". It does not necessarily relate to "competent" which is the primary goal of our training program.

250.1502 **What are my general responsibilities of training?**
a) *This section appears to significantly expand the scope of the current Subpart O Training requirements since it defines training for all employees on the lease without in relationship to job responsibilities. As written this section would make the leasee ultimately responsible for the training program for such personnel as caterers, painters, boat skippers and helicopter pilots.*
b) *The requirements for lessees to develop a detailed training and record keeping program for each employee as defined in (a) adds tremendously to our administrative burden. Much of this prescription seems to be 180° out of phase with the intent of a competency based system. Likewise, the expansion of this program seems redundant with other programs that Shell already has in place such as SEMP.*
c) *Although Shell keeps training histories on our own employees for the five-year period, we feel that to require the same for our contractors is almost an insurmountable task given the rather transient nature of that work force from contractor to contractor and facilities to facilities. Certainly, we feel that maintaining training histories on contract employees for a five-year period is not worth the administrative burden, particularly in lieu of our goal of a competency based system. Current certification and training records retention for the responsibilities at hand are much more reasonable.*

250.1503 **What job skills and safety knowledge elements must my training cover for Well Control, Production Safety Systems, and the other types of training?**
The skills and safety knowledge training elements are covered fully in sections a) and b); "enough training to assure competency in assigned duties", "training in basic safety and environmental issues and procedures". The comments made in (c) and (d) really add no value, are redundant, and tend only to confuse the issue.

250.1504 **What Well Control training must my employee receive?**
Other than providing an audit tool the training table adds no value. The fact "employees must receive enough training to ensure competency in their assigned duties" as stated in 250.1503 basically says it all. To go so

far in the table as to say in section (r), "At least two simulator practice problems rotating trainees using teams of three or less members" appears to demonstrate that the rule is retaining prescription while touting "training flexibility."

- 250.1505** **What training must my Production Safety System employees receive?**
Our comments are basically the same as those for 250.1504. Again the items are too prescriptive for all situations but may be perfectly appropriate for others. For example, why should we train every operator on how to "operate, maintain, repair, and install subsurface controlled safety valves" when the majority of our platforms have only surface controlled systems. The advantage of having a flexible system is not having to train on equipment or processes that do not exist.
- 250.1506** **What other types of training must my employees receive?**
The statement should read "Your employees must receive other applicable training as shown in the following table." For example, all of our employees do not operate cranes and very few work in areas where they can be exposed to hydrogen sulfide.
- 250.1507** **No Comment**
- 250.1508** **No Comment**
- 250.1509** **How often must I train my added as follows?**
*The word applicable should be added as follows:
"and to keep them current in the latest applicable technological advances and regulatory changes"*
- 250.1510** **How will MMS measure training results?**
The question would probably be better phrased as to how will the MMS measure "competency" since and the resulting performance is the goal of the training program. It can be acknowledged that it may be a difficult task to measure and can probably only be judged by company performance. The MMS already has a system in place to measure this through their current ongoing site inspections as well as their annual performance reviews of the operators. This will provide much more valuable data in a performance-based system than an audit of the training system or employee testing.
- a) The scope of the training plan needs to be defined as mentioned earlier. The definition of employee and training begs the question as to who and what. Does this mean for every single person on the lease, in every single task, including a five-year training history, is available for the audit? The administrative burden would be tremendous.*
 - b) Interviewing employees to gain knowledge requires special skills on the interviewers part. In our opinion, this would require the MMS to have the trained personnel with the proper techniques to adequately perform this task.*

- c) *Written tests often are only a quick assessment of the individual's ability to remember facts. They often provide little insight as to willingness to properly apply them. Written tests administered on producing facilities could be extremely disruptive to the normal work routine and could potentially jeopardize the safety of the operations. If given, we would request that the MMS testing occur during the audit of the routine training program.*
- d) *As above, we request this be as minimal as possible, particularly live well testing for obvious reasons. Due to the wide variation in types of simulators, we would suggest that the testing be done as part of the routine training program if at all possible. Disruptions in operations would be minimized and the employee would have the highest probability of familiarity with the simulator operations.*

250.1511

What must I do when MMS administers written tests?

- a) *Delete "years of experience in present position" and "years of total oil field experience" from the requirements. Not only does it add to the administrative burden, but it also adds little value to the criteria as to whether the individual is really performing his or her job properly.*

250.1512

What must I do when MMS requires hands-on simulator, or other types of testing?

- a) *As above. Again to minimize work disruption, reduce costs and maximize safety we request this testing be done with the normal onshore training schools if at all possible.*
- b) *Change the verbage to read "pay for all reasonable costs associated with the training.*

250.1513

What will MMS do if my employees are not properly trained?

In the spirit of the revision, we question whether the words "not properly trained" should be deleted and replaced with the words "incompetent and not able to perform their assigned duties." Competency and performance is the bottom line of the proposed revision, not reassessment of the training program. If deficiencies are found, both the assessment of non-performance and the penalties are just as they are in the current program.